

To: Magee, Gerald (Jerry)[gimagee@blm.gov]
Cc: Kristi Mastrofini[kmastrof@blm.gov]; Joel Brumm[jbrumm@blm.gov]; KFMT[blm_or_kf_management_team@blm.gov]; Madeline Campbell[m1campbe@blm.gov]
From: Austin, Terry
Sent: 2017-05-31T15:11:53-04:00
Importance: Normal
Subject: Re: Follow-up on the Monument Review Data Call
Received: 2017-05-31T15:12:01-04:00
1. KFalls Response_Corrected Initial Data Request Related to CSNM Expansion.docx
2. KFalls Response_Additional Information Requested Template.docx
KF Attachment 1_Grazing_CSNM Data Call.xlsx
KF Attachment 2_Timber_CSNM Expansion Analysis.pdf
KF Attachment 3_News article_opposition to monument expansion.pdf

Hi Jerry,

Here you go - let me know if you have any questions or if you need anything else.

Please send us a copy of the combined document - curious to see how it all turns out!

Thanks again for the phone call today - it was very helpful to talk to you. ~*Terry*
Terry Austin

Planning & Environmental Coordinator

Klamath Falls Resource Area, Lakeview BLM

(541) 885-4142, taustin@blm.gov

On Tue, May 30, 2017 at 4:09 PM, Magee, Gerald (Jerry) <gimagee@blm.gov> wrote:

Hi Terry,

Sounds good. Could you cc Joel Brumm and Kristi Mastrofini when you send your answers to the two forms, as we'll likely use one or the other as the "base" document to aggregate into.

I just uploaded the SW Oregon RMP ROD to the nat'l Drive site, so together with the Redding and the CSNM RMP/RODs, we've got all of the currently effective RMPs for lands in both the original and expanded Monument. And Joel is completing a table of Range data by allotment by year that will be used to support the response to those questions.

Thanks for all of your work on this, and I look forward to receiving your data tomorrow morning.

Jerry Magee
 BLM Oregon-Washington State Office
 Wilderness & Nat'l Conservation Lands Program Lead
 Telephone: (503) 808-6086
 FAX: (503) 808-6021
 Email: gimagee@blm.gov



On Tue, May 30, 2017 at 3:01 PM, Austin, Terry <taustin@blm.gov> wrote:

Hi Jerry,

Yes, I did receive the invite and I viewed the documents already uploaded. We won't have any documents to upload to the nat'l site (i.e. the RMP and proclamation for the CSNM expansion, etc. would be the same as those that Medford already uploaded), so that should make it easier.

I was planning to send our responses to the questions directly to you for consolidation with Medford and Redding by tomorrow morning - will that work for you?

We have most of the questions answered - just need to change the format on our range data to facilitate consolidation, and a couple of folks need to review it.

The original CSNM is only on the Medford side, so KFRA is only impacted by the Expansion Area in Klamath County. So our responses all pertain to the Expansion Area. Actually, we do manage the grazing allotments that cross onto the Medford side, so the range data will have some information for the Original Monument as well.

Hope that helps - let me know if you have any other questions. Thanks! ~Terry

Terry Austin
 Planning & Environmental Coordinator
Klamath Falls Resource Area, Lakeview BLM
 (541) 885-4142, taustin@blm.gov

On Tue, May 30, 2017 at 2:28 PM, Magee, Gerald (Jerry) <gmagee@blm.gov> wrote:

Hi Terry,

I responded to some questions from Ashland and Redding today, so have checked in with them, but wanted you to be aware of requests for our status on the data call (see ASD inquiry below).

Due to my absence last Fri and problems transferring docs between our google drive and the nat'l folder, I requested permission for you to have direct access to the nat'l site. I've not rec'd any WO response, so wondered if you rec'd an invitation to collaborate that verifies you have access. If so, you can directly upload requested documents that are not already in that folder.

I also wanted to make sure that you're pulling the requested information by Original Monument and Expansion Area, and that you're coordinating with Medford to ensure that the data is compatible enough to allow for aggregation under those two categories.

I'm sorry for this unexpected workload, but really appreciate your work on completing it. I'll be consolidating everything

we've got by tomorrow, so hoping you've had good luck in gathering the data needed to answer the questions.

Please let me know whether or not you were invited to the nat'l Drive site, and I'll follow up w/ WO if necessary.

Thanks.

Jerry Magee
BLM Oregon-Washington State Office
Wilderness & Nat'l Conservation Lands Program Lead
Telephone: (503) 808-6086
FAX: (503) 808-6021
Email: gmagee@blm.gov

Klamath Falls Resource Area (Lakeview District) BLM Responses for Cascade Siskiyou NM Expansion

Call for Data Related to Review of National Monuments under EO 13792 (April 26, 2017)

Please help us gather information about each of the items listed below, for each of the National Monuments listed below in Table 1.

1. Documents Requested – See Medford Response
 - a. Resource Management Plans/Land Use Plans
 - b. Record of Decision
 - c. Public Scoping Documents
 - d. Presidential Proclamation
2. Information on activities permitted at the Monument, including annual levels of activity from the **date of designation to the present** **Designation date for the CSNM expansion is January 12, 2017**
 - a. Recreation - annual visits to site

The CSNM expansion area in Klamath County has been in winter/snow covered condition for most of the period since designation. Visitation for winter sports (snowmobiling and xc skiing) is estimated at 1000 visits.
 - b. Energy - annual production of coal, oil, gas and renewables (if any) on site; amount of energy transmission infrastructure on site (if any) - None
 - c. Minerals - annual mineral production on site - None
 - d. Timber - annual timber production on site (in board-feet, CCF, or similar measure)

Timber production within the CSNM Expansion Area within Klamath County since designation was 10 MBF due to the Jigsaw timber sale that was sold prior to the Expansion.
 - e. Grazing - annual grazing on site (AUMs permitted and sold)
 - i. The total annual permitted AUMs within the CSNM expansion area is 803. Currently 698 AUMs have been billed in 2017. See KF attachment 1: Grazing_CSNM Data Call
 - f. Subsistence - participation rates for subsistence activities occurring on site (fishing, hunting, gathering); quantities harvested; other quantifiable information where available None
 - g. Cultural - list of cultural uses/values for site; number of sites; other quantifiable information where available
 - i. A total of 23 archaeological surveys have been carried out to date and cover 94 percent of the Klamath Falls Resource Area portion of the monument expansion; 755.8 acres contain no survey.
 - ii. As of May 30, 2017, the KFRA geodatabase indicates that nine sites are located within the KFRA expansion area. Three sites are prehistoric (pre-dating the 1800s) and six are historic. The three prehistoric sites consist of lithics, while the historic sites are related to cadastral surveys (blazed bearing trees and historic survey monuments).
3. Information on activities occurring during the **5 years prior to Expansion designation**
 - a. Recreation - annual visits to site

14,000 annual visits (RMIS data and estimates)
 - b. Energy - annual production of coal, oil, gas and renewables (if any) on site; amount of energy transmission infrastructure on site (if any)

- c. Minerals - annual mineral production on site
 - d. Timber - annual timber production on site (in board-feet, CCF, or similar measure)

Average annual timber production in the CSNM Expansion Area within Klamath County over the past 5 years has been 2,653 MBF
 - e. Grazing - annual grazing on site (AUMs permitted and sold)

The permitted AUMs prior to designation were the same as after. One of two permittees on one allotment didn't graze and another allotment didn't have a permittee five years prior to designation, reducing total billed AUMs to 566 out of 692 permitted AUMs.
 - f. Subsistence - participation rates for subsistence activities occurring on site (fishing, hunting, gathering); quantities harvested; other quantifiable information where available
 - g. Cultural - list of cultural uses/values for site; number of sites; other quantifiable information where available
 - i. In the five year period prior to the expansion of the CSNM, two cultural resource surveys were conducted, amounting to 2,340 acres being surveyed in what was to become the CSNM. Following the expansion, two surveys (total 395 acres) were finalized in the CSNM.
 - ii. In the five year period prior to the expansion of the CSNM, two historic sites (historic cadastral marker and bearing trees) were documented. Following the expansion, no sites have been documented.
4. Information on activities that likely would have occurred annually from the date of designation to the present **if the Monument Expansion had not been designated**
- a. Recreation - annual visits to site

1000 visits. Due to the short time period (January 12, 2017 to the present) and limited access due to snow cover, it is unlikely that visitation would have been substantially different if the Monument Expansion had not been designated.
 - b. Energy - annual production of coal, oil, gas and renewables (if any) on site; amount of energy transmission infrastructure on site (if any) None
 - c. Minerals - annual mineral production on site None
 - d. Timber - annual timber production on site (in board-feet, CCF, or similar measure)
 - i. Had the Monument Expansion not been designated, KFRA would have continued to plan for entire FY17 ASQ of 6 MMBF to come from Leek Peak Project within the Expansion Area.
 - ii. Portion of CSNM Expansion within Klamath County is 99% O&C lands (11,715 acres out of 11,791 acres) which encompasses Klamath Falls Resource Area's (KFRA) O&C timber sale plans for the next 8 - 10 years
 - iii. Due to the CSNM Expansion into Klamath County, KFRA will not meet the newly signed Resource Management Plan ASQ (allowable sale quantity) for at least 15 years.
 - iv. KFRA ASQ of 6 MMBF (million board feet) is unsustainable and needs to be recalculated.

- v. O&C funding will not likely continue at current levels if KFRA cannot meet ASQ targets.

vi. See KF attachment 2: Timber_CSNM_Expansion Analysis

e. Grazing - annual grazing on site (AUMs permitted and sold)

Grazing/ AUMs active and billed would likely have remained the same. A reduction of permitted AUMs did occur on one allotment after a rangeland health assessment found grazing to have been a causal factor for not meeting standards and guidelines.

f. Subsistence - participation rates for subsistence activities occurring on site (fishing, hunting, gathering); quantities harvested; other quantifiable information where available -None

g. Cultural - list of cultural uses/values for site; number of sites; other quantifiable information where available

The BLM does not have sufficient information to predict how designation of the monument has impacted cultural uses of the Monument Expansion Area within Klamath County.

5. Changes to boundaries - dates and changes in size CSNM Expansion January 12, 2017 - 11,791 acres in Klamath County, including 11,715 acres of O&C lands
6. Public Outreach prior to Designation - outreach activities conducted and opportunities for public comment Klamath County Commissioners held a Town Hall Meeting on November 1, 2016 in which attendees were largely opposed to the Monument Expansion. See KF attachment 3 - News article November 9, 2016.
7. Terms of Designation – See Medford Response

Table 1. List of National Monuments Included in Review (per Dol Press Release dated May 5, 2017)

National Monument	Location	Managing Agency
Basin and Range	Nevada	BLM
Bears Ears	Utah	BLM, USFS
Berryessa Snow Mountain	California	USFS, BLM
Canyons of the Ancients	Colorado	BLM
Carizzo Plain	California	BLM
Cascade Siskiyou	Oregon	BLM
Craters of the Moon	Idaho	NPS, BLM
Giant Sequoia	California	USFS
Gold Butte	Nevada	BLM
Grand Canyon-Parashant	Arizona	BLM, NPS
Grand Staircase-Escalante	Utah	BLM
Hanford Reach	Washington	FWS, DOE
Ironwood Forest	Arizona	BLM
Mojave Trails	California	BLM
Organ Mountains-Desert Peaks	New Mexico	BLM
Río Grande del Norte	New Mexico	BLM
Sand to Snow	California	BLM, USFS
San Gabriel Mountains	California	USFS
Sonoran Desert	Arizona	BLM
Upper Missouri River Breaks	Montana	BLM
Vermilion Cliffs	Arizona	BLM
Katahdin Woods and Waters	Maine	NPS
Marianas Trench	CNMI/Pacific Ocean	FWS
Northeast Canyons and Seamounts	Atlantic Ocean	NOAA, FWS
Pacific Remote Islands	Pacific Ocean	FWS
Papahānaumokuākea	Hawai'i/Pacific Ocean	NOAA, FWS
Rose Atoll	American Sāmoa/Pacific Ocean	FWS

Attorney-client Privileged - DRAFT – Preliminary Analysis subject to further authentication

ESTIMATION OF CASCADE-SISKIYOU MONUMENT EXPANSION OF HARVEST MODELING CALCULATIONS

Prepared by Carolina Hooper

March 16, 2017

SUMMARY OF FINDINGS

New sustained yield calculations that exclude the Cascade Siskiyou Monument Expansion (CSME) will *likely* reduce the ASQ harvest in Medford from 37 million bdft/year to 35-36 million bdft/year. In Lakeview the ASQ harvest will likely be reduced from 6 million bdft/year to 3-4 million bdft/year. On average, for the first 50 years, the Medford District's modeled non-ASQ harvest will *likely* be reduced by 4 million bdft/decade, or 400,000 bdft/year.

Assumptions

To make an estimate of impacts to harvest modeling, requires making assumptions. For this effort I assumed that no ASQ harvest and no Reserve harvest will occur in the CSME. There are *substantial* uncertainties about the future management of the CSME, and the assumptions for this paper don't represent an interpretation of the meaning of the Proclamation.

Methods

These estimates used the harvest modeling results for Sensitivity Run 3 (SR3). These results were combined with a spatial file of the CSME that was developed from 1/17/2017 Cascade-Siskiyou National Monument map. The modeled harvest from the first five decades, and the 20th decade both within and outside of the CSME where analyzed for this report.

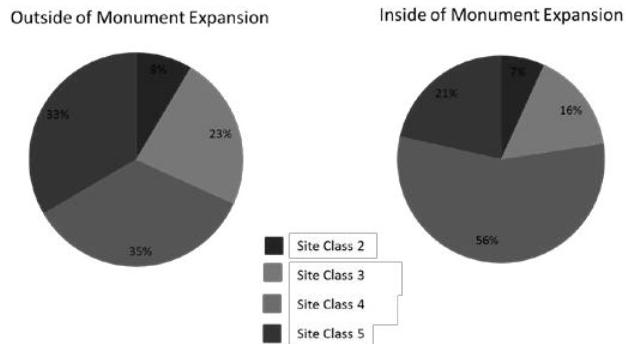
Effect on Sustained Yield Calculation¹

- The total sustained yield calculation for the Medford District is 37 million bdft/year. The acres in the CSME have a similar site class distribution to the overall Medford HLB acres. I *estimate* that a new sustained yield calculation that does not include the CSME area will be between 35 and 36 million bdft/year. This represents a 4% decrease.

¹ Changes in the sustained yield can only be confirmed by doing new Woodstock modeling runs, which were not done for this estimate.

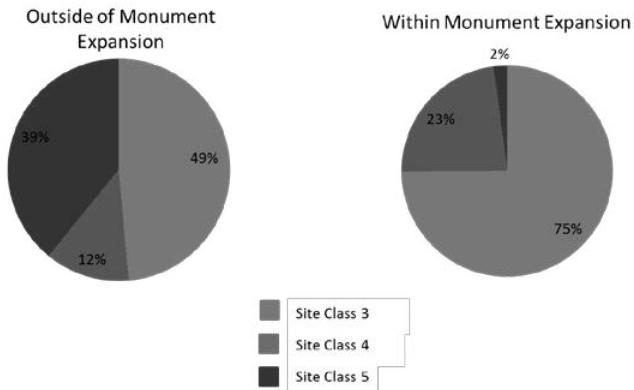
Attorney-client Privileged - DRAFT – Preliminary Analysis subject to further authentication

Medford Site Class Distribution - Harvest Land Base



- The total sustained yield calculation for the Lakeview District is 6 million bdft/year. The acres in the CSME have a higher site quality on average than the overall HLB acres. Removing these acres will likely have a disproportionately larger effect on the sustained yield calculation than the actual volume forgone in the first 5 decades. I estimate that a new sustained yield calculation that does not include the CSME area will be 3-4 million bdft/year. This represents a 32-50% decrease from the current calculation.

Lakeview Site Class Distribution - Harvest Land Base

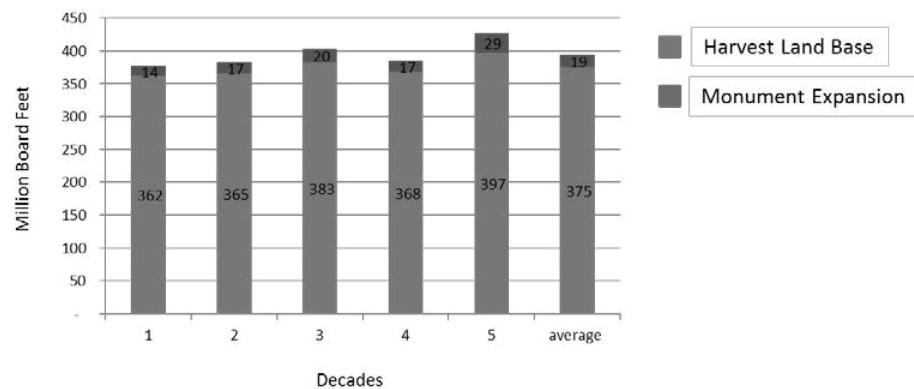
**ASQ Harvest Levels**

- Approximately 5% of the Medford District's ASQ harvest in the next 5 decades is modeled in the CSME Area. In the next 5 decades, between 1 and 3 million board feet per year(bdft/year) or between 14 and 30 million bdft/decade is modeled for harvest in the Expansion Area.

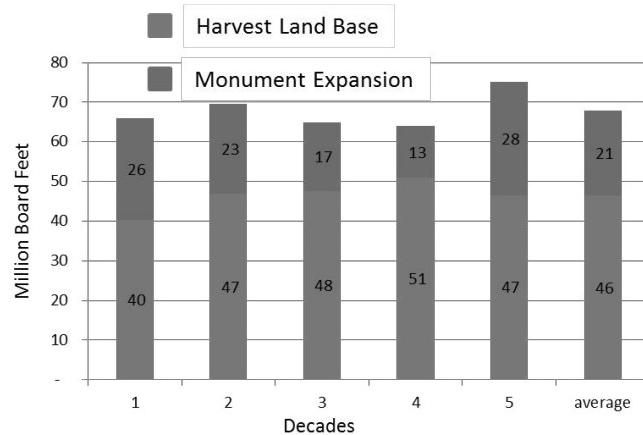
Attorney-client Privileged - DRAFT – Preliminary Analysis subject to further authentication

- Approximately 32% of the Lakeview District's ASQ harvest in the next 5 decades is modeled in the CSME Area. In the next 5 decades, between 1 to 3 million bdft/year or between 11 to 30 million bdft/decade is modeled for harvest in the Expansion Area.
- For both Districts the percentage of ASQ harvest in the CSME Area decreases through time. This is because the expected harvest from the Harvest Land Base – Uneven age Timber Area (UEMA) increases through time, and most of the UEMA is outside of the Expansion Area.

Medford District ASQ Harvest Location



Lakeview District ASQ Harvest Location

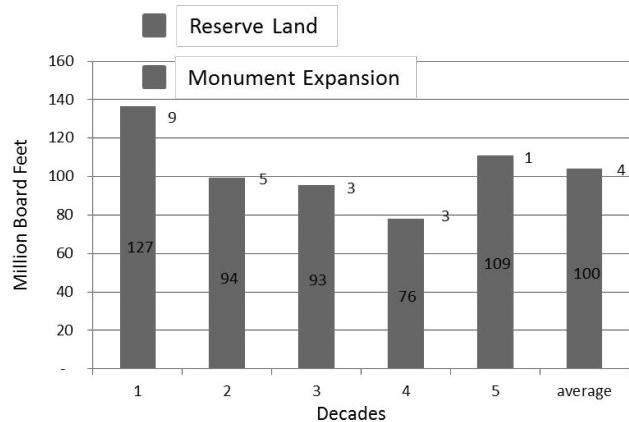


Reserve Harvest Levels

- There is no modeled Reserve harvest on the Lakeview District.
- Approximately 4% of the Medford District's Reserve harvest in the next 5 decades will be in the CSME Area. In the next 5 decades, less than 1 million bdft/year or between 1 and 9 million bdft/decade was modeled to be harvested in the Expansion Area.

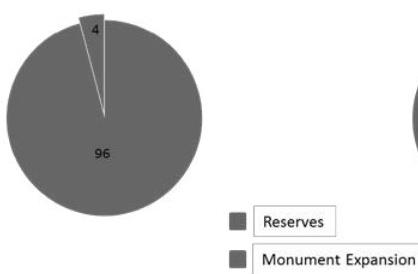
Attorney-client Privileged - DRAFT – Preliminary Analysis subject to further authentication

Medford District Reserve Harvest Location



Medford District – Percentage of Reserve Harvest from Reserves vs. Monument Expansion

Average First Five Decades



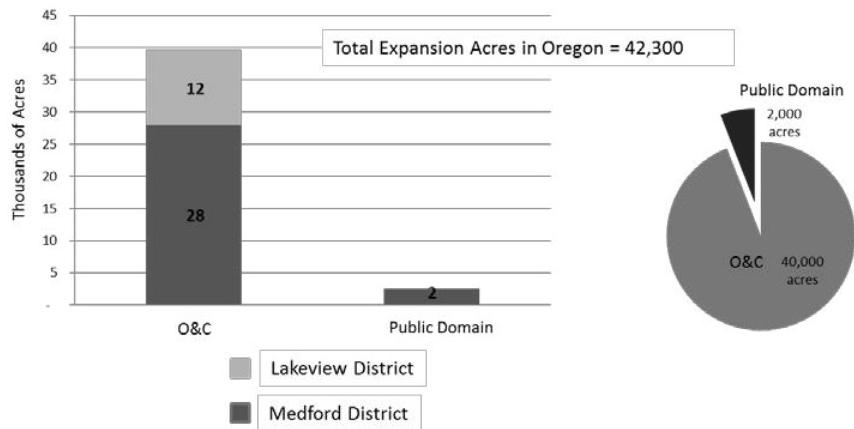
200 years

Federal Status

- 99% of the CSME Area in Lakeview District is Oregon and California Railroad Act land (O&C)
 - 92% of the CSME Area in the Medford District is Oregon and California Railroad Act land (O&C) and 8% is Public Domain (PD) land.

Attorney-client Privileged - DRAFT – Preliminary Analysis subject to further authentication

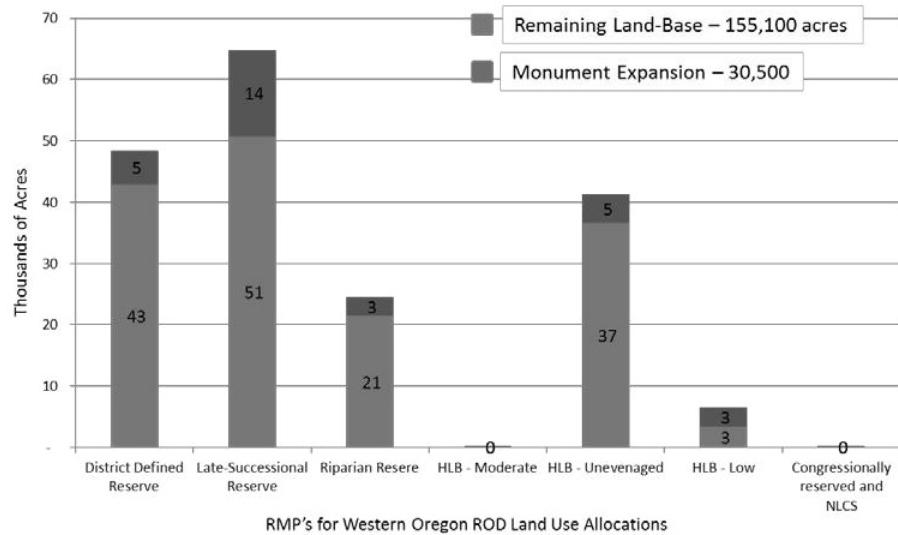
Federal Status of Monument Expansion



Land-Use Allocations

- The CSME covers 30,500 acres from the Ashland Resource Area, leaving 155,100 acres. The CSME removes 7,900 acres of HLB. This is approximately 50% of the Low Intensity Timber Area (LITA) and 13% of the Unevenaged Timber Area (UETA).

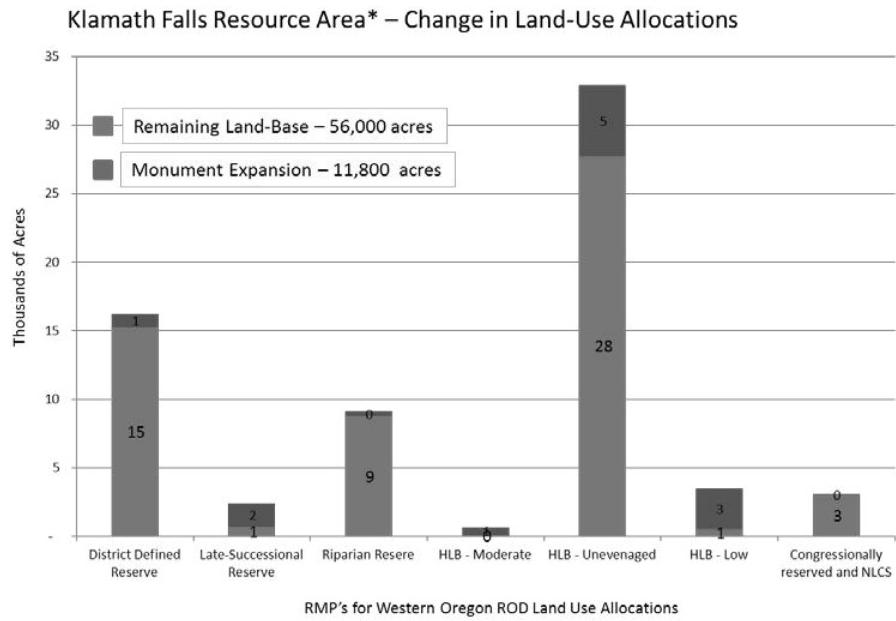
Ashland Resource Area – Change in Land-Use Allocations



- The CSME covers 11,800 acres from the Klamath Falls Resource Area, leaving 52,000 acres (not including the Eastside Management Lands). The CSME removes 8700 acres of HLB. Approximately 84% of the LITA, 16% of the UETA, and 89% of the Moderate Intensity Timber Area (MITA) are in the

Attorney-client Privileged - DRAFT – Preliminary Analysis subject to further authentication

CSME. There are approximately 28,000 acres left in the Harvest Land Base, 99% of the remaining HLB is UETA.



* Does not include the Eastside Management Lands of 147,100 acres

Topics for Further Consideration

- Given the reduction in HLB, can the Medford and/or Lakeview Districts continue to meet their ASQ targets in the short term, given the annual and decadal variation specified in the RODS?
- Should new modeling calculations be done for both the Medford and the Lakeview Districts given the annual and decadal variation that is in the RODS?
 - If we decide on new modeling runs, when should new modeling runs occur? (e.g., now, at the time of a planning action for the SW Oregon RMP, at the 5-year evaluation).
- Given the small acreage and volume of the Klamath Falls sustained yield unit (SYU) without the CSME, would it be appropriate to consider changes to the Klamath Falls SYU?



**New Information Requested on Executive Order on the Review
of Designations Under the Antiquities Act**

**Klamath Falls Resource Area (Lakeview District) BLM Responses to Additional Questions
for Cascade Siskiyou National Monument Expansion**

- a) Any legislative language, including legislation in appropriations bills - None
 - [Identify if there is any related legislation regarding your monument]
- b) Alternative options available for protection of resources applicable at each monument, such as Native American Graves Protection and Repatriation Act, Paleontological Resources Preservation Act, Archaeological Resources Protection Act, Historic Preservation Act and agency-specific laws and regulations. None

The following could provide some options to protect specific resources found in [Name] National Monument. Protection would likely occur on a site-by-site or resource-by-resource basis and also would take a significant amount of time to accomplish under these various laws. These laws may not provide a mechanism to protect all cultural or tribal resources in [Name] National Monument. [Provide any specific information or examples for your monument.]

National Historic Preservation Act, (NHPA)

Native American Graves Protection and Repatriation Act, (NAGPRA)

Paleontological Resources Preservation Act, (PRPA)

Archaeological Resources Protection Act, (ARPA)

American Indian Religious Freedom Act (AIRFA)

- c) Designated wilderness areas (name, acreage), Wilderness Study Areas (name if there is one, acreage, type), and/or areas managed to preserve wilderness or roadless characteristics that are not WSAs. None

[Insert monument specific response]

- d) Outstanding R.S. 2477 claims within a monument – type of road claimed and history

[Insert monument specific response] None

- e) Maps

[Insert monument specific response] None

- f) Cultural or historical resources, particularly Tribal, located near a monument but not within the boundary that might benefit from inclusion in the monument - None

[Insert monument specific response]

- g) Other – general questions or comments

[Insert monument specific response regarding any other information that should be considered in the review of your monument]

Klamath County Portion of CSNM Expansion

- January 12, 2017 Proclamation authorizing the CSNM expansion includes a list of objects of scientific or historical interest which **do not** occur within the Klamath County portion of the expansion such as the Klamath largescale sucker, endangered shortnose sucker, endangered Lost River sucker, pygmy rabbit, American pika.
- Portion of CSNM Expansion within Klamath County is 99% O&C lands (11,715 acres out of 11,791 acres.)
- This area encompasses Klamath Falls Resource Area's (KFRA) O&C timber sale plans for the next 8 - 10 years.
- Due to the CSNM Expansion into Klamath County, KFRA will not meet the newly signed Resource Management Plan ASQ (allowable sale quantity) for at least 15 years.
- KFRA ASQ of 6 MMBF (million board feet) is unsustainable and needs to be recalculated.
- O&C funding will not likely continue at current levels if KFRA cannot meet ASQ targets.
- KFRA BLM lands and private lands within CSNM expansion are fragmented and include extensive road systems and lands extensively managed for timber production.
- No Threatened & Endangered Plant species have been found within the Klamath County portion of the CSNM expansion in 20+ years of surveys.
- CSNM expansion in Klamath County impacts O&C Reciprocal ROW areas that provide access to private timber lands.
- KFRA economic contributions to local economy:
 - Approximately \$5 million per year direct funding to KFRA BLM employees and projects; O&C Timber Sales Approximately \$1.5 million per year; Rent paid by KFRA BLM for office space is approximately \$250,000 per year
- Motorized access within original CSNM (roads) is currently being reduced/eliminated.
 - CSNM expansion area within Klamath County could result in reduced motorized access for various public uses, Christmas trees, firewood, mushrooms, recreation, hunting, etc. Roads closed or obliterated as a result of CSNM expansion could limit access for fire suppression and weed treatments

Klamath Falls Resource Area Response to CSNM Expansion Data Call - Grazing

Question 2e			
Allotment	Year	Permitted	Billed
Dixie	2000	413	413
Dixie	2001	413	413
Dixie	2002	320	320
Dixie	2002	320	320
Dixie	2003	320	320
Dixie	2004	320	320
Dixie	2005	320	320
Dixie	2006	320	320
Dixie	2007	320	320
Dixie	2008	320	320
Dixie	2009	320	320
Dixie	2010	320	320
Dixie	2011	320	320
Dixie	2012	320	320
Dixie	2013	320	320
Dixie	2014	320	32
Dixie	2015	80	77
Dixie	2016	80	77
Dixie	2017	320	320

Question 3e			
Allotment	Year	Permitted	Billed
Dixie	1995	413	413
Dixie	1996	413	413
Dixie	1997	413	413
Dixie	1998	413	413
Dixie	1999	413	413

Question 4e**Dixie Allotment**

If the CSNM had not been designated the annual AUMs permitted and billed would likely have been the same as the grazing leases did not change from the original (2000) and the expansion (2017) designations. The reduction in permitted AUMs is from a Rangeland Health Assessment

Question 2e			
Allotment	Year	Permitted	Billed
Buck Mountain	2000	0	0
Buck Mountain	2001	204	122
Buck Mountain	2002	204	122
Buck Mountain	2003	204	122
Buck Mountain	2004	204	122
Buck Mountain	2005	204	122
Buck Mountain	2006	204	122
Buck Mountain	2007	204	108
Buck Mountain	2008	204	108
Buck Mountain	2009	204	108
Buck Mountain	2010	204	108
Buck Mountain	2011	204	108
Buck Mountain	2012	204	108
Buck Mountain	2013	204	108
Buck Mountain	2014	204	108
Buck Mountain	2015	204	108
Buck Mountain	2016	204	108
Buck Mountain	2017	204	108

Question 3e			
Allotment	Year	Permitted	Billed
Buck Mountain	1995	No grazing lease in file	Nothing in RAS or file
	1996		
	1997		
	1998		
	1999		

Question 4e**Buck Mountain Allotment**

The Buck Mountain Allotment would likely remain the same as billed since no changes to the annual permitted AUMs is documented due to the 2000 designation. No changes to the annual AUMs has occurred for the 2017 designation at this time either

Question 2e			
Allotment	Year	Permitted	Billed
Buck Lake	2017	279	174

Two operators are on this allotment As of 5/25/17 only one operator has been billed for 2017 grazing use. The other has not responded to multiple inquiries to determine intentions for this season and as such has not been billed

Question 3e			
Allotment	Year	Permitted	Billed
Buck Lake	2012	279	153
Buck Lake	2013	279	153
Buck Lake	2014	279	153
Buck Lake	2015	279	259
Buck Lake	2016	279	153

Question 4e**Buck Mountain Allotment**

Buck Lake Allotment was not within the 2000 designation only the 2017 expansion At this time no changes to the annual AUMs has changed

http://www.heraldandnews.com/news/commissioners-join-opposition-to-monument-expansion/article_05a84a19-cf67-5ac9-8661-3fe3e1b45c37.html

TOP STORY

Commissioners join opposition to monument expansion

By STEPHEN FLOYD H&N Staff Reporter Nov 9, 2016

Tired of seeing surveys on articles? If you are a subscriber, simply [log in](#) or [Subscribe now!](#)



Klamath County Commissioners have voted to oppose expansion of the Cascade Siskiyou National Monument after local residents showed overwhelming resistance to the proposal.

Commissioners voted unanimously Tuesday to take a stance against monument expansion and to draft a letter to federal officials detailing their displeasure with the plan.

"The whole package has just been put together badly," said Commissioner Jim Bellet.

This comes after commissioners held a town hall meeting Nov. 1 during which local residents and officials spoke largely against expansion. During the meeting commissioners said they would take time to review input before declaring their position and did so on Tuesday.

Klamath County lands

The proposal, put forward by Sen. Jeff Merkley, would add 66,500 acres to the 66,000 acre monument, including 19,000 acres in Klamath County. Merkley's office is accepting public comment on the issue until Nov. 20 after which time his office will forward input to Secretary of the Interior Sally Jewell, who will then make a recommendation to President Barack Obama.

Critics of the proposal are concerned Obama will unilaterally approve monument expansion using the Antiquities Act of 1906, which authorizes the president to create national monuments from public lands by proclamation. The Antiquities Act was used by President Bill Clinton to establish the monument in 2000.

Such concerns were echoed Tuesday by commissioners, who said the process thus far has excluded residents and officials who may be opposed to expansion while there is no indication yet Merkley, Jewell or Obama will change course.

"That's disappointing that the federal government wouldn't come and want to talk to Klamath County about something going on in Klamath County, especially a monument," said Bellet.

"I question whether this proposal is legal," said Commissioner Kelley Minty Morris, who pointed out expansion may conflict with the O&C Lands Act of 1937.

Timber revenue

Klamath is one of a number of Oregon counties challenging the federal government for not fulfilling mandates within the O&C Lands Act, which regulates the harvesting of 2.6 million acres of timber land in Oregon as well as the division of logging revenue between federal and local governments. The Association of O&C Counties, of which Minty Morris is a board member, claims the government is fulfilling roughly one quarter of its harvesting obligations, leading to steep declines in revenue for affected counties.

Of the 19,000 acres of Klamath County Land proposed for monument expansion, the majority are O&C Lands and commissioners argued the loss of harvestable timber would mean an even larger loss in local revenue.

"I think this is another effort that would really dismantle the O&C (Lands) Act," said Minty Morris.

She added there needs to be further conversations about the management of public lands and, until a consensus is reached, it would be "dangerous" to push through monument expansion.

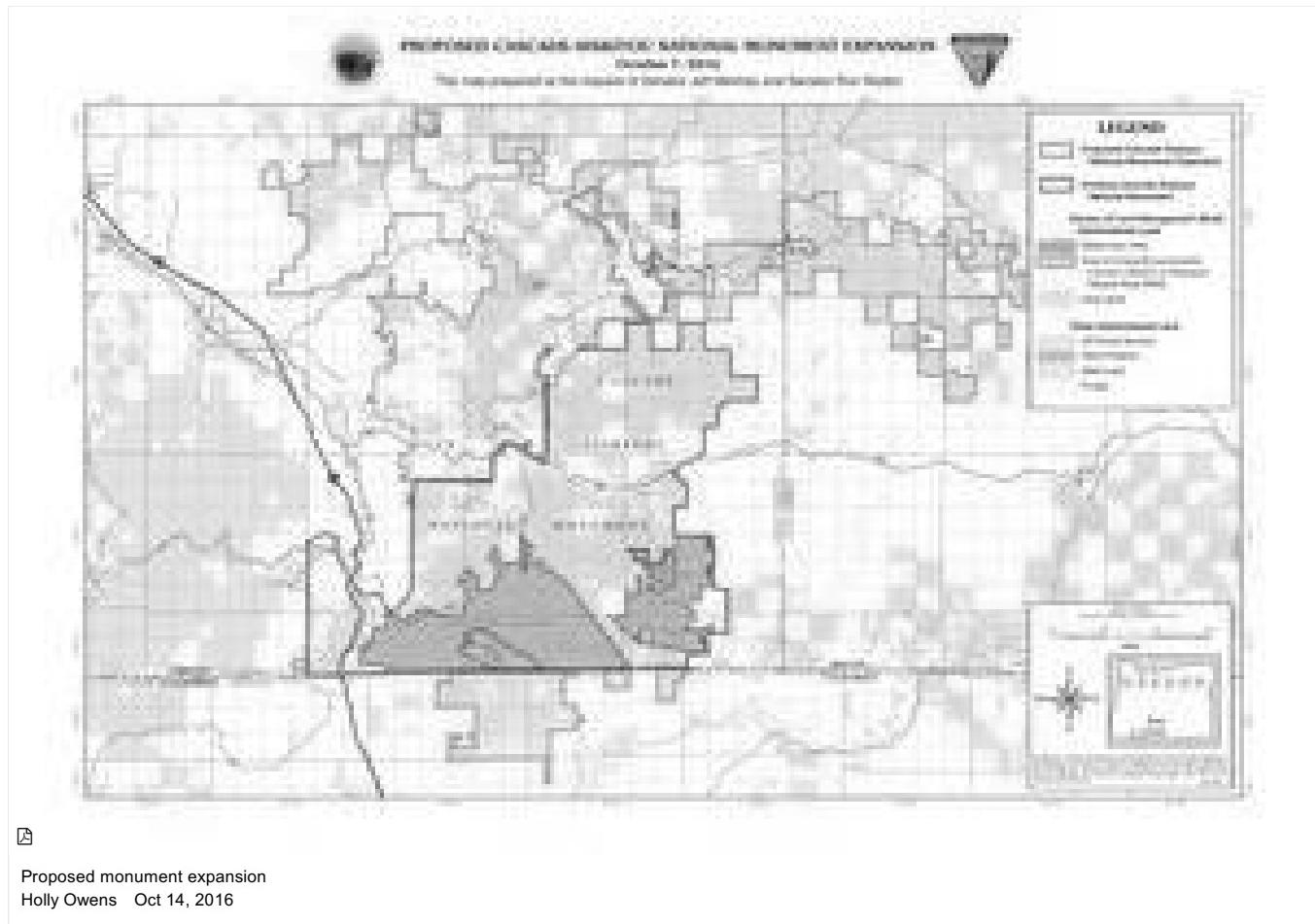
Commissioner Tom Mallams also said he does not believe use of the Antiquities Act is appropriate for monument expansion, stating the landscape "is no Crater Lake."

"This is timber land and grazing land," he said.

Mallams said extra steps are not needed to preserve the natural resources within the proposed area as the agricultural industry has responsibly used the land "for generations." He also said he would be opposed to any form of expansion, not simply a re written proposal, and believes it would be government overreach to further restrict access to natural resources.

To view a map of the proposed expansion, see this story at heraldandnews.com.

sfloyd@heraldandnews.com



New commissioners also against monument expansion

Incoming Klamath County Commissioners say they share the current board's opposition to expansion of the Cascade-Siskiyou National Monument and would support efforts to re-tool or reject the proposal in the future.

Commissioner-elect Donnie Boyd and presumptive election winner Derrick DeGroot said Tuesday they believe expansion would reduce the strength of the local economy and said they support the many residents who have come out against the proposal.

Boyd won the race for commissioner position one when he received a majority of votes during the primary election. DeGroot became the sole candidate for commissioner position three after incumbent Jim Bellet withdrew from the race Aug. 9.

Both have since been attending regular commissioner meetings and are expected to take office Jan. 3.

Both have since been attending regular commissioners meetings and are expected to take office Jan. 3.

"The last thing I think we need to do is take away our wealth-building industries in Klamath County," said Boyd of expansion's potential impact on the timber industry.

"Without that stuff, all we're doing is transporting money around people's hands," he continued.

"I support the board's move here today to compose a letter and formally oppose the monument," said DeGroot, who attended an earlier town hall meeting about expansion and said he supports the public's opposition to the plan.